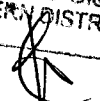


FILED

MAR 06 2019

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY**UNITED STATES DISTRICT COURT**

for the

Western District of Texas

United States of America)

v.)

RAUL VALDEZ)

Case No. SA-19-MJ-0256-001)

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 5, 2019 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:*Code Section*21 U.S.C. Sections
841(a)(1) & 841(b)(1)(A)*Offense Description*Conspiracy to Possess and Possession with Intent to Distribute 500
grams or more of a Mixture or Substance Containing a Detectable
Quantity of Methamphetamine..PENALTIES: 10 years to LIFE imprisonment; \$10,000,000 fine,
Minimum mandatory 5 years supervised release, \$100 mandatory
special assessment.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet. 2348
Complainant's signature

Detective Gregory Neufeld, SAPD

Printed name and title

- ☒
- Sworn to before me and signed in my presence.
-
- ☐
- Sworn to telephonically and signed electronically.

Date: March 5, 2019
Judge's signatureCity and state: San Antonio, Texas

Elizabeth S. Chestney, United States Magistrate Judge

Printed name and title

ATTACHMENT "A"

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

Gregory Neufeld, BEING DULY SWORN, DEPOSES AND SAYS:

Your Affiant is employed by the San Antonio Police Department (SAPD) where he is assigned to the Narcotics Unit as a Detective Investigator. I have been employed by SAPD for approximately 9 years and have been involved in numerous Narcotic investigations.

Your Affiant and SAPD Detective Rivera received information that the Defendant, Raul VALDEZ (VALDEZ), was involved in the manufacturing and distribution of commercial quantities of Methamphetamine and Heroin from a residence located at XXXX Longhorn Xing, San Antonio, Texas, as well as throughout the City of San Antonio. From previous Narcotic investigations, we have arrested VALDEZ for possession of Heroin and Methamphetamine, and he is currently on bond for these pending charges. From our investigations, we know VALDEZ to be an active member in the prison gang known as "Mexican Mafia".

Surveillance was conducted at XXXX Longhorn Xing on numerous occasions, during various times of the day. While conducting surveillance at the location Det. Rivera and I observed various unknown individuals arrive at the location in different vehicles. The unknown individuals would contact VALDEZ at the front door or inside the garage. The unknown individuals would then be invited into the location. After a brief stay, the unknown individuals would leave the location. At other times we observed VALDEZ and followed him throughout the City of San Antonio where we would then see him meet up with unknown individuals. After a brief meeting with these individuals, VALDEZ and the individual he met would depart in opposite directions. These actions are consistent with how he delivered Narcotics during our previous investigations.

On March 5th 2019, while conducting surveillance at XXXX Longhorn Xing, I observed VALDEZ walk out of the residence, place an unknown item in the back seat of a light green 2003 Mazda Tribute, and then entered the driver's seat. An unknown female entered the front passenger seat. VALDEZ then departed the location. While conducting computer research we discovered that VALDEZ had an active warrant for Possession Marijuana.

I maintained constant visual surveillance on VALDEZ as he drove east bound on Marbach Rd. The vehicle which VALDEZ was operating was seen failing to use its turn signal multiple times as it changed lanes. At this time I contacted uniform patrol to assist with conducting a traffic stop of the listed vehicle. A SAPD Uniformed Officer Jones arrived in the area and stopped the vehicle which VALDEZ was operating.

Upon contacting VALDEZ, who failed to possess a valid Texas Operators license, Officer Jones had VALDEZ exit the vehicle. Officer Jones asked VALDEZ if he had anything illegal on his person. VALDEZ advised that he did not and told Officer Jones that he could search him. Officer Jones searched VALDEZ and located two glass Methamphetamine smoking pipes in his jacket pockets. Officer Jones then placed VALDEZ under arrest for his warrant.

As Officer Jones proceeded to search the vehicle, Officer Jones searched in and around VALDEZ's immediate reach and close proximity, At this time Officer Jones located a blue backpack in the middle of the rear back seat. Inside the backpack Officer Jones located several plastic bags containing a field weight of approximately **236.1 grams of alleged Heroin, 206.9 grams of alleged Methamphetamine**, and one (1) stolen **Springfield 9mm handgun**.

Officer Jones read VALDEZ his Constitutional Miranda Rights. VALDEZ stated he understood his rights and waived them at this time. VALDEZ advised that the Heroin, Methamphetamine and Handgun in the backpack belonged to him. I then arrived at the traffic stop and contacted VALDEZ. I asked VALDEZ about his place of residence located on Longhorn Xing. VALDEZ distanced himself away from this address and stated he did not live there nor did he just leave there.

With the actions being conducted at the location along with the fact that VALDEZ was found in possession of a large amount of alleged Methamphetamine and Heroin, I applied for and was granted state search warrant for XXXX Longhorn Xing. We then executed the search warrant at XXXX Longhorn Xing on this date, March 5th 2019.


Upon securing the residence, a search was conducted. The entire residence reeked of burning/burnt Marijuana. We focused a majority of our attention on an upstairs bedroom which possessed several of VALDEZ's personal belongings. VALDEZ also stated that everything inside this particular room was his and not his sisters.

VALDEZ's key chain, which had several various keys on it, was also brought back to the residence. This set of keys contained a key to the ignition to the vehicle in which he was operating, a key to the front door of the listed residence, a key to his bedroom which was locked, and a key to a sentry safe which was located inside the bedroom. Inside of his bedroom, we located a large amount of POR (proof of residence) paperwork belonging to VALDEZ. No other room showed to have any other POR for VALDEZ. A further search of his bedroom yielded a field weight of **3625.7 grams of alleged Methamphetamine, 475.8 grams of alleged Heroin**, four (4) handguns in a sentry safe, and six (6) handguns throughout his bedroom. VALDEZ voluntarily signed SAPD Form 8-V Voluntary Acknowledgment of Contraband Possession, which states that he is alone responsible for the items taken into custody from this residence.

All evidence collected at the traffic stop and the residence was photographed, collected and processed by the Evidence Custodian Detective J. Pryde #2164. The

alleged Methamphetamine collected was positively field tested as Methamphetamine by Detective Pryde. The alleged Heroin collected was positively field tested as Heroin by Detective Pryde.

Further Affiant sayeth not.



Detective Gregory Neufeld
SAPD Narcotics Unit Detective

Subscribed and sworn to on this the 6th day of March, 2019.



ELIZABETH S. CHESTNEY
UNITED STATES MAGISTRATE JUDGE